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STATE OF ILLINOIS )

) SS

COUNTY OF COOK )

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

TOM STURDIVANT, )

) Plaintiff, )

vs. )

Case No.

2021L009373

WALMART, INC., )

) Defendant. )

COMPLAINT AT LAW

NOW COMES the Plaintiff, TOM STURDIVANT, by and through his attorneys, LAW OFFICE OF DANIEL E. GOODMAN, LLC, who complain of the Defendant, WALMART, INC., as follows:

1. On or about November 17, 2019, and at all times relevant herein, the Defendant, WALMART, INC., owned, maintained, operated, managed, controlled and/or possessed the Wal-Mart store and surrounding property located at or near 2225 W. Market Street in the City of Bloomington, County of McLean and State of Illinois.

2. At the time and place aforesaid, the Plaintiff, TOM STURDIVANT, was lawfully upon the aforementioned premises as a customer of the Wal-Mart store.

3. At the time and place aforesaid, the Plaintiff, TOM STURDIVANT, slipped and fell after stepping into a puddle of liquid located on the floor of an aisle of the aforementioned Wal-Mart store.

EXHIBIT B



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4. At the time and place aforesaid, the Defendant, WALMART, INC. individually, and through its employees and agents, had a duty to exercise ordinary care in the ownership, possession, operation, management, control and maintenance of the aforesaid premises so that customers of the Wal-Mart store, including Plaintiff, were not injured.

5. That at the time and place aforesaid, the Defendant, WALMART, INC., individually and through their employees and agents breached the aforesaid duty when the Defendant carelessly and negligently did the following acts and/or omissions:

- a. Carelessly and negligently failed to adequately inspect the aisle of the premises at issue when such inspection would have revealed the existence of an accumulation of a liquid;
- b. Carelessly and negligently failed to maintain, possess, operate, manage, and/or control the premises such that an accumulation of liquid was allowed to form in the aisle;
- c. Carelessly and negligently failed to warn its business invitees, including the Plaintiff, of the existence of an accumulation of liquid on the floor;
- d. Carelessly and negligently failed to remove the accumulation of liquid from the floor of the aisle where Plaintiff fell;
- e. Was otherwise careless and negligent in its ownership, maintenance, management, operation and control of the premises at issue.

6. As a direct and proximate result of one or more of the aforesaid wrongful acts and/or omissions of the Defendant, WALMART, INC., the Plaintiff, TOM STURDIVANT, was severely and permanently injured both internally and externally, and suffered a severe shock to his nervous system, and bruises, contusions, and lacerations to his body, and became and was sick and disabled, and suffered, and will in the future suffer, great pains, discomfort and physical impairment, all of which injuries are permanent; and he has lost and will in the future lose other great gains which he otherwise would have made and acquired; and he has been kept and will be



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kept from attending to his ordinary affairs and duties, and the Plaintiff has become liable for large sums of money for medical and hospital care and attention.

WHEREFORE, the Plaintiff, TOM STURDIVANT, prays for judgment against the Defendant, WALMART, INC., in a sum greater than Fifty-Thousand Dollars (\$50,000), as will fairly and adequately compensate him for his injuries and damages, together with his costs in bringing this suit.

Respectfully Submitted,

Adriel E. Zupances  
One of Plaintiff's Attorneys

Atty. No. 46715  
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